



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: December 29, 2011

RE: Aleris Recycling, Inc / 169-30783-00035

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot12/03/07



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**Federally Enforceable State Operating Permit  
Renewal  
OFFICE OF AIR QUALITY**

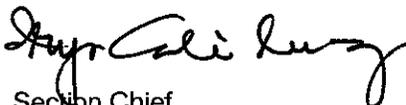
**Aleris Recycling, Inc.  
305 Dimension Avenue  
Wabash, Indiana 46992**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F169-26165-00035	
Issued by: <i>original signed by</i> Iryn Calitung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 15, 2009  Expiration Date: January 15, 2019
First Administrative Amendment No. 169-29330-00035, issued June 24, 2010 Interim Significant Permit Revision No. 169-30783i-00035, issued September 8, 2011	
First Significant Permit Revision No. 169-30783-00035	
Issued by:  Iryn Calitung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 29, 2011  Expiration Date: January 15, 2019

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary Secondary aluminum smelting operation.

Source Address:	305 Dimension Avenue, Wabash, Indiana 46992
General Source Phone Number:	(260) 563-2409
SIC Code:	3341 (Secondary Smelting and Refining of Nonferrous Metals)
County Location:	Wabash
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories (Secondary Metal Production)

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) raw material unloading area, consisting of ten (10) bays, identified as RMUA, approved for modification in 2011, using baghouse MB4 for particulate control, and exhausting through stack S-MB4;
- (b) One (1) Milling Operation Stage #1, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB1 for particulate control, exhausting through stack S-MB1, and consisting of the following:
  - (1) Two (2) Grizzly Feeders, identified as GF1 and GF2, installed in 1998;
  - (2) One (1) tumbler, identified as T, installed in 1996;
  - (3) One (1) shaker table infeed conveyor, identified as ST1;
  - (4) Six (6) screw conveyors, identified as SC1 through SC6;
  - (5) One (1) belt conveyor, identified as BC2.
- (c) One (1) Milling Operation Stage #2, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB2 for particulate control, exhausting through stack S-MB2, and consisting of the following:
  - (1) One (1) Mega Slam primary crusher, identified as MS, installed in 1998;
  - (2) One (1) Mega Slam shaker table/grizzly, identified as ST2;

- (3) One (1) Midwest screen, identified as SS1;
  - (4) Six (6) screw conveyors, identified as SC7 through SC12;
  - (5) Four (4) belt conveyors, identified as BC1, BC3, BC4, and BC5; and
  - (6) Three (3) raw material unloading bays.
- (d) One (1) Milling Operation Stage #3, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB3 for particulate control, exhausting through stack S-MB3, and consisting of the following:
- (1) One (1) Cage Mill secondary crusher, identified as CM, installed in 1998;
  - (2) One (1) Midwest screen, identified as SS2;
  - (3) Ten (10) screw conveyors, identified as SC13 through SC22;
  - (4) Four (4) belt conveyors, identified as BC6 through BC9; and
  - (5) Three (3) tank discharge vibratory feeders, identified as PF1, PF2, and PF3.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total heat input capacity of 0.465 million British thermal units per hour consisting of:
  - (1) One (1) office hot water heater, rated at 0.040 million British thermal units per hour.
  - (2) One (1) office furnace, rated at 0.070 million British thermal units per hour.
  - (3) Two (2) break room furnaces, rated at 0.070 million British thermal units per hour each.
  - (4) One (1) break room hot water heater, rated at 0.040 million British thermal units per hour.
  - (5) One (1) maintenance furnace, rated at 0.075 million British thermal units per hour.
  - (6) One (1) maintenance heater, rated at 0.100 million British thermal units per hour.
- (b) Various types of diesel-fueled mobile equipment.
- (c) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) Cleaners and solvents characterized as follows:

- (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
  - (f) Paved roads and parking lots with public access.
  - (g) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
  - (h) One (1) diesel above-ground storage tank, approved for construction in 2011, with a maximum storage capacity of one thousand (1,000) gallons, and dispensing two thousand (2,000) gallons per month.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- (a) This permit, F169-26165-00035, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort or any exclusive privilege.

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (i) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
- (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F169-26165-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Reserved**

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**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Development Section, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Development Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Development Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Development Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases, as CO<sub>2</sub>e, shall be limited to less than 100,000 tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on October 7, 2008. The plans included as Attachment B.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.12 Reserved**

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#### **C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an

alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

#### **C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reserved

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

(a) One (1) raw material unloading area, consisting of ten (10) bays, identified as RMUA, approved for modification in 2011, using baghouse MB4 for particulate control, and exhausting through stack S-MB4;

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4]

#### D.1.1 PM<sub>10</sub> and PM<sub>2.5</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]

(a) Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the Raw Material Unloading Area (RMUA), shall not exceed 3.34 pounds per hour.

(b) Pursuant to 326 IAC 2-8-4, the PM<sub>2.5</sub> emissions from the Raw Material Unloading Area (RMUA), shall not exceed 3.34 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from other emission units at the source, shall limit the PM<sub>10</sub> and PM<sub>2.5</sub> from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

#### D.1.2 PM Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the Raw Material Unloading Area (RMUA), shall not exceed 3.34 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

#### D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the Raw Material Unloading Area (RMUA) shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee

shall perform PM testing of the Raw Material Unloading Area (RMUA), within 180 days of startup, utilizing methods as approved by the Commissioner.

- (b) In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM10 testing of the Raw Material Unloading Area (RMUA), within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM2.5 testing of the Raw Material Unloading Area (RMUA), within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.1.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]

- (a) In order to comply with Conditions D.1.1 and D.1.2, the cyclone and baghouse for PM control shall be in operation at all times when the Raw Material Unloading Area (RMUA) is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.1.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]

- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB4, used in conjunction with the Raw Material Unloading Area (RMUA), at least once per day when the Raw Material Unloading Area (RMUA) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B -

Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### D.1.9 Visible Emissions Notations

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- (a) Visible emission notations of the Raw Material Unloading Area (RMUA) stack exhaust, S-MB4, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the Raw Material Unloading Area (RMUA) stack exhaust S-MB4 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (b) One (1) Milling Operation Stage #1, approved for construction in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB1 for particulate control, exhausting through stack S-MB1, and consisting of the following:
- (1) Two (2) Grizzly Feeders, identified as GF1 and GF2, installed in 1998;
  - (2) One (1) tumbler, identified as T, installed in 1996;
  - (3) One (1) shaker table infeed conveyor, identified as ST1;
  - (4) Six (6) screw conveyors, identified as SC1 through SC6; and
  - (5) One (1) belt conveyor, identified as BC2.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4]

#### D.2.1 PM<sub>10</sub> and PM<sub>2.5</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the milling operation Stage #1 shall not exceed 4.75 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the PM<sub>2.5</sub> emissions from the milling operation Stage #1 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM10 and PM2.5 from other emission units at the source, shall limit the PM10 and PM2.5 from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

#### D.2.2 PM Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the milling operation Stage #1 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

#### D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the milling operation Stage #1 shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.2.5 Testing Requirements [326 IAC 2-1.1-11]

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- (a) In order to demonstrate compliance with Conditions D.2.2 and D.2.3, the Permittee shall perform PM testing of the milling operation Stage #1, consisting of two (2) Grizzly Feeders, one (1) tumbler, one (1) shaker table infeed conveyor, six (6) screw conveyors, and one (1) belt conveyor, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM10 testing of the milling operation Stage #1, consisting of two (2) Grizzly Feeders, one (1) tumbler, one (1) shaker table infeed conveyor, six (6) screw conveyors, and one (1) belt conveyor, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Conditions D.2.1, the Permittee shall perform PM2.5 testing of the milling operation Stage #1, consisting of two (2) Grizzly Feeders, one (1) tumbler, one (1) shaker table infeed conveyor, six (6) screw conveyors, and one (1) belt conveyor, within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.2.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]

---

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation at all times when the milling operation Stage #1 is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]

---

- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB1, used in conjunction with the milling operation Stage #1, at least once per day when the milling operation Stage #1 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response.

Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.2.8 Broken or Failed Bag Detection

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### D.2.9 Visible Emissions Notations

---

- (a) Visible emission notations of the milling operation Stage #1 stack exhaust, S-MB1, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.10 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the milling operation Stage #1 stack exhaust S-MB1 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

### SECTION D.3.

### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (c) One (1) Milling Operation Stage #2, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB2 for particulate control, exhausting through stack S-MB2, and consisting of the following:
- (1) One (1) Mega Slam primary crusher, identified as MS, installed in 1998;
  - (2) One (1) Mega Slam shaker table/grizzly, identified as ST2;
  - (3) One (1) Midwest screen, identified as SS1;
  - (4) Six (6) screw conveyors, identified as SC7 through SC12;
  - (5) Four (4) belt conveyors, identified as BC1, BC3, BC4, and BC5; and
  - (6) Three (3) raw material unloading bays.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4]

##### D.3.1 $PM_{10}$ and $PM_{2.5}$ Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the  $PM_{10}$  emissions from the milling operation Stage #2 shall not exceed 4.75 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the  $PM_{2.5}$  emissions from the milling operation Stage #2 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit  $PM_{10}$  and  $PM_{2.5}$  from other emission units at the source, shall limit the  $PM_{10}$  and  $PM_{2.5}$  from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

##### D.3.2 PM Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the milling operation Stage #2, shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

##### D.3.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the milling operation Stage #2 shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### **Compliance Determination Requirements**

#### D.3.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform PM testing of the milling operation Stage #2, consisting of one (1) Mega Slam crusher, one (1) Mega Slam shaker table/grizzly, one (1) Midwest screen, six (6) screw conveyors, four (4) belt conveyors, and three (3) raw material unloading bays, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM10 testing of the milling operation Stage #2, consisting of one (1) Mega Slam crusher, one (1) Mega Slam shaker table/grizzly, one (1) Midwest screen, six (6) screw conveyors, four (4) belt conveyors, and three (3) raw material unloading bays, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM2.5 testing of the milling operation Stage #2, consisting of one (1) Mega Slam crusher, one (1) Mega Slam shaker table/grizzly, one (1) Midwest screen, six (6) screw conveyors, four (4) belt conveyors, and three (3) raw material unloading bays, within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.3.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]

- (a) In order to comply with Conditions D.3.1 and D.3.2, the baghouse for PM control shall be in operation at all times when the milling operation Stage #2 is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.3.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]

- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB2, used in conjunction with the milling operation Stage #2, at least once per day when the milling operation Stage #2 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range

established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.3.8 Broken or Failed Bag Detection

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### D.3.9 Visible Emissions Notations

---

- (a) Visible emission notations of the milling operation Stage #2 stack exhaust, S-MB2, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.3.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.3.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.3.9, the Permittee shall maintain records of visible emission notations of the milling operation Stage #2 stack exhaust S-MB2 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.4.

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) One (1) Milling Operation Stage #3, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB3 for particulate control, exhausting through stack S-MB3, and consisting of the following:
- (1) One (1) Cage Mill secondary crusher, identified as CM, installed in 1998;
  - (2) One (1) Midwest screen, identified as SS2;
  - (3) Ten (10) screw conveyors, identified as SC13 through SC22;
  - (4) Four (4) belt conveyors, identified as BC6 through BC9; and
  - (5) Three (3) tank discharge vibratory feeders, identified as PF1, PF2, and PF3.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4]

#### D.4.1 PM<sub>10</sub> and PM<sub>2.5</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the milling operation Stage #3 shall not exceed 4.75 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the PM<sub>2.5</sub> emissions from the milling operation Stage #3 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM10 and PM2.5 from other emission units at the source, shall limit the PM10 and PM2.5 from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

#### D.4.2 PM Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the milling operation Stage #3, shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

#### D.4.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the milling operation Stage #3 shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and}$$

P = process weight rate in tons per hour

#### D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.4.5 Testing Requirements [326 IAC 2-1.1-11]

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- (a) In order to demonstrate compliance with Conditions D.4.2 and D.4.3, the Permittee shall perform PM testing of the milling operation Stage #3, consisting of one (1) Cage Mill secondary crusher, one (1) Midwest screen, ten (10) screw conveyors, four (4) belt conveyors, and three (3) tank discharge vibratory feeders, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM10 testing of the milling operation Stage #3, consisting of one (1) Cage Mill secondary crusher, one (1) Midwest screen, ten (10) screw conveyors, four (4) belt conveyors, and three (3) tank discharge vibratory feeders, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM2.5 testing of the milling operation Stage #3, consisting of one (1) Cage Mill secondary crusher, one (1) Midwest screen, ten (10) screw conveyors, four (4) belt conveyors, and three (3) tank discharge vibratory feeders, within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.4.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]

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- (a) In order to comply with Conditions D.4.1 and D.4.2, the baghouse for PM control shall be in operation at all times when the milling operation Stage #3 is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.4.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]

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- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB3, used in conjunction with the milling operation Stage #3, at least once per day when the milling operation Stage #3 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation

with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### D.4.8 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### D.4.9 Visible Emissions Notations

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- (a) Visible emission notations of the milling operation Stage #3 stack exhaust, S-MB3, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.4.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.4.7, the Permittee shall maintain

daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).

- (b) To document the compliance status with Condition D.4.9, the Permittee shall maintain records of visible emission notations of the milling operation Stage #3 stack exhaust S-MB3 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

**Certification Form Certification Form**

**Certification Form INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Aleris Recycling, Inc.  
Source Address: 305 Dimension Avenue, Wabash, Indiana 46992  
FESOP Permit No.: F169-26165-00035

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance and Enforcement Branch  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Aleris Recycling, Inc.  
Source Address: 305 Dimension Avenue, Wabash, Indiana 46992  
FESOP Permit No.: F169-26165-00035

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Aleris Recycling, Inc.  
Source Address: 305 Dimension Avenue, Wabash, Indiana 46992  
FESOP Permit No.: F169-26165-00035

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Aleris Recycling, Inc.</b>
<b>Source Location:</b>	<b>305 Dimension Avenue, Wabash, Indiana 46992</b>
<b>County:</b>	<b>Wabash</b>
<b>SIC Code:</b>	<b>3341 (Secondary Smelting and Refining of Nonferrous Metals)</b>
<b>Operation Permit No.:</b>	<b>F 169-26165-00035</b>
<b>Operation Permit Issuance Date:</b>	<b>January 15, 2009</b>
<b>Significant Permit Revision No.:</b>	<b>169-30783-00035</b>
<b>Permit Reviewer:</b>	<b>Jack Harmon</b>

On August 10, 2011, the Office of Air Quality (OAQ) received an application from Aleris Recycling, Inc. related to a modification to an existing stationary secondary aluminum smelting source processing aluminum dross and scrap aluminum to change the scope of its operations to eliminate the melting of aluminum dross and scrap aluminum, and to remain a crushing, milling, and grinding operation; and to upgrade its existing equipment. Additional information was received August 22 and September 9, 2011.

<b>Source Definition</b>
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This source consists of the following plants:

- (a) Aleris Recycling, Inc. is located at 305 Dimension Avenue, Wabash, IN 46992, Plant ID: 169-00035; and
- (b) Aleris Specification Alloys, Inc. is located at 4525 West Old US 24, Wabash, IN 46992, Plant ID: 169-00010.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These plants are located on separate properties, approximately 4.7 miles apart. Although they have common ownership, each has its own plant management team. Both plants have the same SIC of 3341 (Secondary Smelting and Refining of Nonferrous Metals); however each has a different process and a different customer base. Of the total product output of Aleris Recycling Inc., only 9% is shipped to Aleris Specification Alloys, Inc.; the other 91% is shipped out of state to Wisconsin to another facility. For Aleris Specification Alloys, a very small percentage of its raw material received is supplied by Aleris Recycling, and it is not dependent upon Aleris Recycling for its raw material in order to operate. Therefore, since these two facilities are not dependent upon each other for purchases and/or sales, they are considered as separate sources, and Aleris Recycling, Inc. will be issued its own FESOP, and Aleris Specification Alloys, Inc. will be issued its own Part 70 permit.

This determination was not addressed in the previous Aleris Recycling, Inc. permits because, at that time, there was no common ownership involved. Aleris purchased the second facility in 2010, and, therefore, a source determination was appropriate with this Significant Permit Revision.

**Existing Approvals**

The source was issued FESOP Renewal No. 169-26165-00035 on January 15, 2009. The source has since received the following approvals:

- (a) Administrative Amendment No. 169-29330-00035, issued on June 24, 2010; and
- (b) Interim Significant Permit Revision No. 169-30783i-00035, issued on September 8, 2011.

**County Attainment Status**

The source is located in Wabash County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	
Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Wabash County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Wabash County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this source is classified as a secondary metal production plant, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Two (2) Oxygen Rotary Furnaces (F1, F2) <sup>(3)</sup>	22.0 <sup>(1)(2)</sup>	22.3 <sup>(1)</sup>	22.3 <sup>(1)</sup>	0.03	0.02	0.29	4.42	7,403.00	9.99	9.99
Tumbler - Baghouse (MB1)	17.5	17.5	17.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sizing Line - Baghouse (MB2)	5.00	1.48	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	4.99	1.48	1.48	0.50	0.00	2.00	0.50	0.00	0.00	0.00
Fugitive Emissions	10.05	2.01	0.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>90.72</b>	<b>52.99</b>	<b>52.99</b>	<b>0.53</b>	<b>0.52</b>	<b>2.29</b>	<b>4.92</b>	<b>7,403.00</b>	<b>9.99</b>	<b>9.99</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	100	100	100	100	100	100	100	100,000	NA	NA

These emissions are based upon the FESOP Renewal permit number 169-26165-00035, issued January 15, 2009. The Administrative Amendment number 169-29330-00035, issued June 24, 2009 contained administrative changes only and did not change the calculated emissions.

<sup>(1)</sup> Emissions from salt cake cooling rack are included in this value.

<sup>(2)</sup> The emission value is adjusted to ensure the total PM emissions were less than 100 tons per year.

<sup>(3)</sup> Process emissions and combustion emissions have been combined for the two (2) furnaces.

\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Aleris Recycling, Inc. on August 10, 2011, relating to a modification to an existing stationary secondary aluminum smelting source

processing aluminum dross and scrap aluminum to change the scope of its operations to eliminate the melting of aluminum dross and scrap aluminum, and to remain a crushing, milling, and grinding operation. Although the source is removing its furnaces and will no longer melt aluminum dross or scrap aluminum, it has requested to maintain the same SIC classification of 3341 and remain one (1) of the twenty-eight (28) source categories. The source has also requested the following changes to be made to its permit:

- (a) To remove its two (2) oxygen rotary furnaces, identified as F1 and F2;
- (b) To remove its salt cake cooling rack with hood;
- (c) To remove the lime injection control device, identified as FB1;
- (d) To increase its proposed throughput in its three (3) milling operations from 14 tons per hour to 20 tons per hour;
- (e) To add/reconfigure four (4) baghouses, identified as MB1 (previously MB2), MB2, MB3, and MB4, for particulate control;
- (f) To upgrade and add new liners for the tumbler, identified as T;
- (g) To replace two (2) screen units and various conveyors;
- (h) To rearrange its emissions units from a general listing to cell-like units, with each being controlled by a baghouse. Each piece of equipment will be listed and grouped according to the control device associated with that operation;
- (i) To change the description of the insignificant activity of internal combustion engines to more accurately describe these units as mobile equipment. There are no other internal combustion engines at this facility; and
- (j) To add one (1) diesel above-ground liquid storage tank to the Insignificant Activities listing, with a maximum storage capacity of one thousand (1,000) gallons, and dispensing two thousand (2,000) gallons of diesel fuel per month.

There are no unpermitted emission units at the facility.

<b>Enforcement Issues</b>
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There are no pending enforcement actions related to this revision.

<b>Emission Calculations</b>
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See Appendix A of this TSD for detailed emission calculations.

<b>Permit Level Determination – FESOP Revision</b>
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The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.



Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Total PTE of Entire Source	<b>79.00</b> <del>90.72</del>	<b>79.49</b> <del>52.99</del>	<b>78.99</b> <del>52.99</del>	<b>0.00</b> <del>0.53</del>	<b>0.00</b> <del>0.52</del>	<b>0.00</b> <del>2.29</del>	<b>0.00</b> <del>4.92</del>	<b>0.00</b> <del>0.00</del>	<b>4.96E+00</b> 9.99E+00	<b>2.40E+00</b> (Manganese)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	100	100	100	100	100	100	100	100,000	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.  
\*\*\* The source has elected to limit its emissions for these units for PM, PM10, and PM2.5.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Raw Material Unloading Area (MB4)***	14.64	14.64	14.64	0.00	0.00	0.00	0.00	0.00	3.12E-02	1.51E-02
Milling Operations Stage #1 (MB1)***	18.79	20.79	20.79	0.00	0.00	0.00	0.00	0.00	1.64E+00	7.96E-01
Milling Operations Stage #2 (MB2)***	18.79	20.79	20.79	0.00	0.00	0.00	0.00	0.00	1.64E+00	7.96E-01
Milling Operations Stage #3 (MB3)***	18.79	20.79	20.79	0.00	0.00	0.00	0.00	0.00	1.64E+00	7.96E-01
Insignificant Activities	4.99	1.48	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fugitive Emissions	3.00	1.00	0.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	79.00	79.49	78.99	0.00	0.00	0.00	0.00	0.00	4.96E+00	2.40E+00 (Manganese)
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	100	100	100	100	100	100	100	100,000	NA	NA

\*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
\*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.  
\*\*\* The source has elected to limit its emissions for these units for PM, PM10, and PM2.5.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). These are Title I changes.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with

the following:

- (1) PM10 emissions from baghouse MB4 shall not exceed 3.34 lb/hr;
- (2) PM10 emissions from baghouse MB1 shall not exceed 4.75 lb/hr;
- (3) PM10 emissions from baghouse MB2 shall not exceed 4.75 lb/hr;
- (4) PM10 emissions from baghouse MB3 shall not exceed 4.75 lb/hr;
- (5) PM2.5 emissions from baghouse MB4 shall not exceed 3.34 lb/hr;
- (6) PM2.5 emissions from baghouse MB1 shall not exceed 4.75 lb/hr;
- (7) PM2.5 emissions from baghouse MB2 shall not exceed 4.75 lb/hr;
- (8) PM2.5 emissions from baghouse MB3 shall not exceed 4.75 lb/hr.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period, greenhouse gases (GHGs) to less than 100,000 tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

These are Title I changes.

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) PM emissions from baghouse MB4 shall not exceed 3.34 lb/hr;
- (2) PM emissions from baghouse MB1 shall not exceed 4.75 lb/hr;
- (3) PM emissions from baghouse MB2 shall not exceed 4.75 lb/hr;
- (4) PM emissions from baghouse MB3 shall not exceed 4.75 lb/hr.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Secondary Aluminum Facilities, 40 CFR 63, Subpart RRR, are no longer applicable to this source, since this revision removed them from the permit. The source no longer melts aluminum and the furnaces have been removed from the facility. Therefore, the requirements of 40 CFR 63, Subpart RRR do not apply. If the source changes this status, this subpart will be re-evaluated for applicability at that time.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new and modified units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the milling operations, shall not exceed the following, as shown below.
- |     |                             |  |
|-----|-----------------------------|--|
| (1) | Raw Material Unloading Area | PM emissions limit = 30.51 pounds per hour, when operating at a process weight rate of 20 tons per hour; |
| (2) | Milling operation Stage #1  | PM emissions limit = 30.51 pounds per hour, when operating at a process weight rate of 20 tons per hour; |
| (3) | Milling operation Stage #2  | PM emissions limit = 30.51 pounds per hour, when operating at a process weight rate of 20 tons per hour; |
| (4) | Milling operation Stage #3  | PM emissions limit = 30.51 pounds per hour, when operating at a process weight rate of 20 tons per hour; |

The pound per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The baghouses MB1, MB2, and MB3 shall be in operation at all times the milling operations are in operation, in order to comply with this limit. The Raw Material Unloading Area has an uncontrolled PTE of 15.43 lb/hr, and can comply with this limit without the use of the baghouse MB4.

- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new and modified unit is less than twenty-five (25) tons per year.
- (i) There are no other 326 IAC 8 Rules that are applicable to the revision.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Baghouse MB1	Pressure Drop	Once per day
Baghouse MB1	Visible Emissions Notation	Once per day
Baghouse MB2	Pressure Drop	Once per day
Baghouse MB2	Visible Emissions Notation	Once per day
Baghouse MB3	Pressure Drop	Once per day
Baghouse MB3	Visible Emissions Notation	Once per day
Baghouse MB4	Pressure Drop	Once per day
Baghouse MB4	Visible Emissions Notation	Once per day

(b) The testing requirements applicable to this proposed revision are as follows:

These are Title I changes.

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Raw Material Unloading Area (RMUA)	Baghouse MB4	PM, PM10, PM2.5	Within 180 days of startup	Every 5 years
Milling Operations Stage #1	Baghouse MB1	PM, PM10, PM2.5	Within 180 days of startup	Every 5 years
Milling Operations Stage #2	Baghouse MB2	PM, PM10, PM2.5	Within 180 days of startup	Every 5 years
Milling Operations Stage #3	Baghouse MB3	PM, PM10, PM2.5	Within 180 days of startup	Every 5 years

The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 169-26165-00035, issued on January 15, 2009.

Proposed Changes
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The source has requested to make changes to its operation, including the removal of furnaces and associated emission units; to increase the throughput capacity of its milling operations; to add/reconfigure four baghouse control devices; and to change the description of its milling operation from a general listing to a grouping of units into a work-cell type, grouped according to its control device. The source has also requested to clarify the description of its Insignificant Activities for mobile equipment and to add a small storage tank.

These changes have been incorporated into Sections A.2 and A.3 of the permit. Currently, the permit contains Sections D.1, D.2, D.3 and E.1. Sections D.1 and E.1 described conditions required for the furnaces and associated equipment, which no longer apply, since the furnaces have been removed. Sections D.2 and D.3 described conditions required for milling equipment. Since the source has requested to change the description of its operations to list its emission units, to group them according to control device, the D-Sections of the permit have been revised to more accurately reflect this change. Therefore, Sections D.1, D.2, and D.3 are shown as a strikethrough in their entirety, and the new replacement Sections D.1, D.2, D.3, and D.4 have been shown as BOLD text. Section E.1 has been removed entirely, since those requirements no longer apply, since the furnaces have been removed.

(a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- ~~(a) Two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, rated at 7.0 million British thermal units per hour each, both controlled by a baghouse with lime injection, identified as FB1, exhausting through Stack S-FB1, installed in 1998 and 2000, respectively, capacity: 3.5 tons per hour of aluminum dross or aluminum scrap each.~~

~~Under NESHAP 40 CFR 63, Subpart RRR, this source is considered an effected facility.~~

- ~~(b) One (1) enclosed salt cake cooling rack with hood, installed in 2000, controlled by a baghouse, identified as FB1, exhausting through Stack S-FB1, capacity: 5.5 tons of salt cake per hour.~~

~~Under NESHAP 40 CFR 63, Subpart RRR, this source is considered an effected facility.~~

- ~~(c) One (1) tumbler, consisting of one (1) screen, one (1) conveyor, one (1) feeding conveyor, and five (5) augers, controlled by a cyclone connected in series with a baghouse, identified as MB1, exhausting through Stack S-MB1, installed in 1996, capacity: 14.0 tons of aluminum dross and/or salt cake per hour.~~

- ~~(d) One (1) sizing line, consisting of one (1) grizzly feeder, one (1) primary crusher (Mega Slam), one (1) secondary crusher (Cage Mill), eight (8) conveyors, two (2) augers, two (2) screens, and three (3) holding tanks, all controlled by a baghouse, identified as MB2, exhausting through Stack S-MB2, installed in 1998, capacity: 14.0 tons of aluminum dross and salt cake per hour.~~

- (a) One (1) raw material unloading area, consisting of ten (10) bays, identified as RMUA, and approved for modification in 2011, using baghouse MB4 for particulate control, and exhausting through stack S-MB4;**

Note: this unloading area was previously listed as an Insignificant Activity, but, since a control device was added for particulate control, it has been moved to this section of the permit as an emission unit.

- (b) One (1) Milling Operation Stage #1, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB1 for particulate control, exhausting through stack S-MB1, and consisting of the following:**

- (1) Two (2) Grizzly Feeders, identified as GF1 and GF2, installed in 1998;**
- (2) One (1) tumbler, identified as T, installed in 1996;**
- (3) One (1) shaker table infeed conveyor, identified as ST1;**
- (4) Six (6) screw conveyors, identified as SC1 through SC6; and**
- (5) One (1) belt conveyor, identified as BC2.**

- (c) One (1) Milling Operation Stage #2, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB2 for particulate control, exhausting through stack S-MB2, and consisting of the following:**

- (1) **One (1) Mega Slam primary crusher, identified as MS, installed in 1998;**
  - (2) **One (1) Mega Slam shaker table/grizzly, identified as ST2;**
  - (3) **One (1) Midwest screen, identified as SS1;**
  - (4) **Six (6) screw conveyors, identified as SC7 through SC12;**
  - (5) **Four (4) belt conveyors, identified as BC1, BC3, BC4, and BC5; and**
  - (6) **Three (3) raw material unloading bays.**
- (d) **One (1) Milling Operation Stage #3, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB3 for particulate control, exhausting through stack S-MB3, and consisting of the following:**
- (1) **One (1) Cage Mill secondary crusher, identified as CM, installed in 1998;**
  - (2) **One (1) Midwest screen, identified as SS2;**
  - (3) **Ten (10) screw conveyors, identified as SC13 through SC22;**
  - (4) **Four (4) belt conveyors, identified as BC6 through BC9; and**
  - (5) **Three (3) tank discharge vibratory feeders, identified as PF1, PF2, and PF3.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

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- (b) ~~Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour, consisting of a 20-hp gasoline fired portable welder.~~ **Various types of diesel-fueled mobile equipment.**

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- ~~(h) Raw material unloading and storage.~~

- (h) **One (1) diesel above-ground storage tank, approved for construction in 2011, with a maximum storage capacity of one thousand (1,000) gallons, and dispensing two thousand (2,000) gallons per month.**

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ~~(a) Two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, rated at 7.0 million British thermal units per hour each, both controlled by a baghouse with lime injection, identified as FB1, exhausting through Stack S-FB1, installed in 1998 and 2000, respectively, capacity: 3.5 tons per hour of aluminum dross or aluminum scrap each.~~

~~(b) One (1) enclosed salt cake cooling rack with hood, installed in 2000, controlled by a baghouse, identified as FB1, exhausting through Stack S-FB1, capacity: 5.5 tons of salt cake per hour.~~

~~(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)~~

### **Emission Limitations and Standards [326 IAC 2-8-4]**

#### **~~D.1.1 HCl (HAP) Limitations [326 IAC 2-8-4]~~**

~~Pursuant to 326 IAC 2-8-4, the Permittee has agreed to limit its annual hydrogen chloride (HCl) throughput from the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, including fluxing exhausting through Stack S-FB1, to 49,500 tons per year at 0.4 pounds per ton.~~

~~Compliance with the above limit, combined with the potential to emit HAPs from other emission units at the source, shall limit single HAPs from the entire source to less than 10 tons per twelve (12) consecutive month period and render 326 IAC 2-7 not applicable.~~

#### **~~D.1.2 PM<sub>10</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]~~**

~~Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, including fluxing, shall not exceed 5.00 pounds per hour total.~~

~~Compliance with the above limit, combined with the limited potential to emit PM10 from other emission units at the source, shall limit the PM10 from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.~~

#### **~~D.1.3 PM Limitations [326 IAC 2-2]~~**

~~The PM emissions from two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, including fluxing, shall not exceed 5.00 pounds per hour total.~~

~~Compliance with the above limit, combined with the potential to emit PM from other emission units at the source, shall limit the PM from the entire limited source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.~~

#### **~~D.1.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]~~**

~~Pursuant to 326 IAC 6-3-2:~~

~~(a) The allowable particulate emission rate from the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, shall not exceed 15.1 pounds per hour, when operating at a total process weight rate of 7.0 tons per hour.~~

~~(b) The particulate from the salt cake cooling rack shall not exceed 12.85 pounds per hour when operating at a process weight rate of 5.5 tons per hour.~~

~~(c) These limitations are based upon the following:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$

~~D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventative Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

**Compliance Determination Requirements**

~~D.1.6 Testing Requirements [326 IAC 2-1.1-11]~~

~~(a) In order to demonstrate compliance with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall perform PM and PM<sub>10</sub> testing of the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, utilizing methods as approved by the Commissioner.~~

~~This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~

~~PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>.~~

~~Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

~~(b) In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform HCl testing of both natural gas-fired oxygen rotary furnaces, identified as F1 and F2, while fluxing and exhausting to Stack S-FB1, utilizing methods as approved by the Commissioner.~~

~~This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~

~~Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

~~D.1.7 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]~~

~~In order to comply with Conditions in D.1.2 and D.1.3, the baghouse for PM control shall be in operation at all times when the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2, are in operation.~~

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

~~D.1.8 Baghouse Parametric Monitoring [326 IAC 2-8-5]~~

~~See Section E.1 for Baghouse Monitoring.~~

**Record Keeping Requirements [326 IAC 2-8-4(3)]**

~~D.1.9 Record Keeping Requirements~~

~~(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain monthly records of the amount of flux added to the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2.~~

~~(b) To document the compliance status with Condition D.1.1, the Permittee shall maintain monthly records of the amount of chlorine injected to the two (2) natural gas-fired oxygen rotary furnaces, identified as F1 and F2.~~

- ~~(c) Section C – General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.~~

### **Reporting Requirements [326 IAC 2-8-5]**

#### **D.1.10. Reporting Requirements**

~~A quarterly summary of the information to document compliance status with Condition D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C – General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the "responsible official" as defined by 326 IAC 2-1.1-1(1)~~

## **SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

### **Emissions Unit Description:**

- ~~(c) One (1) tumbler, consisting of one (1) screen, one (1) conveyor, one (1) feeding conveyor, and five (5) augers, controlled by a cyclone connected in series with a baghouse, identified as MB1, exhausting through Stack S-MB1, installed in 1996, capacity: 14.0 tons of aluminum dross and/or salt cake per hour.~~

~~(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)~~

### **Emission Limitations and Standards [326 IAC 2-8-4]**

#### **D.2.1 PM<sub>10</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]**

~~Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the one (1) tumbler, consisting of one (1) screen, one (1) conveyor, one (1) feeding conveyor, and five (5) augers shall not exceed 4.00 pounds per hour.~~

~~Compliance with the above limit, combined with the limited potential to emit PM10 from other emission units at the source, shall limit the PM10 from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.~~

#### **D.2.2 PM Limitations [326 IAC 2-2]**

~~The PM emissions from the one (1) tumbler, consisting of one (1) screen, one (1) conveyor, one (1) feeding conveyor, and five (5) augers, shall not exceed 4.00 pounds per hour.~~

~~Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.~~

#### **D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

- ~~(a) Pursuant to 326 IAC 6-3-2, the particulate from the tumbler shall not exceed 21.7 pounds per hour when operating at a process weight rate of 14.0 tons per hour.~~

- ~~(b) This limit is based upon the following:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ ————— where E = rate of emission in pounds per hour and} \\ \text{————— P = process weight rate in tons per hour}$$

~~D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventative Maintenance Plan, is required for these facilities and their control devices.  
Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

**Compliance Determination Requirements**

~~D.2.5 Testing Requirements [326 IAC 2-1.1-11]~~

~~In order to demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall perform PM10 testing of the one (1) tumbler, consisting of one (1) screen, one (1) conveyor, one (1) feeding conveyor, and five (5) augers, utilizing methods as approved by the Commissioner.~~

~~This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~

~~Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

~~D.2.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]~~

~~(a) In order to comply with Conditions D.2.1 and D.2.2, the cyclone and baghouse for PM control shall be in operation at all times when the tumbler is in operation.~~

~~(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

~~D.2.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]~~

~~(a) The Permittee shall record the pressure drop across the baghouse, identified as MB1, used in conjunction with the tumbler, at least once per day when the tumbler is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.~~

~~(b) The instruments used for determining the pressure and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.~~

~~D.2.8 Broken or Failed Bag Detection~~

~~(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.~~

~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B -~~

~~Emergency Provisions).~~

- (b) ~~For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.~~

~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).~~

~~Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.~~

~~D.2.9 Visible Emissions Notations~~

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- (a) ~~Visible emission notations of the tumbler stack exhaust, S-MB1, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~If abnormal emissions are observed, the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

**Record Keeping and Reporting Requirements ~~[326 IAC 2-8-4(3)] [326 IAC 2-8-16]~~**

~~D.2.10 Record Keeping Requirements~~

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- (a) ~~To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).~~
- (b) ~~To document the compliance status with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the tumbler stack exhaust S-MB1 once per day. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the tumbler did not operate that day).~~
- (c) ~~Section C – General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.~~

### SECTION D.3. EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

- (d) ~~One (1) sizing line, consisting of one (1) grizzly feeder, one (1) primary crusher (Mega Slam), one (1) secondary crusher (Cage Mill), eight (8) conveyors, two (2) augers, two (2) screens, and three (3) holding tanks, all controlled by a baghouse, identified as MB2, exhausting through Stack S-MB2, installed in 1998, capacity: 14.0 tons of aluminum dross and salt cake per hour.~~

~~(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)~~

#### Emission Limitations and Standards [326 IAC 2-8-4]

##### ~~D.3.1 PM<sub>10</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]~~

~~Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the one (1) sizing line, consisting of one (1) grizzly feeder, one (1) primary crusher (Mega Slam), one (1) secondary crusher (Cage Mill), eight (8) conveyors, two (2) augers, two (2) screens, and three (3) holding tanks shall not exceed 0.338 pounds per hour.~~

~~Compliance with the above limit, combined with the limited potential to emit PM10 from other emission units at the source, shall limit the PM10 from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.~~

##### ~~D.3.2 PM Limitations [326 IAC 2-2]~~

~~The PM emissions from the one (1) sizing line, consisting of one (1) grizzly feeder, one (1) primary crusher (Mega Slam), one (1) secondary crusher (Cage Mill), eight (8) conveyors, two (2) augers, two (2) screens, and three (3) holding tanks, shall not exceed 1.14 pounds per hour.~~

~~Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.~~

##### ~~D.3.3 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)~~

- ~~(a) Pursuant to 326 IAC 6-3-2, the particulate from the sizing line shall not exceed 21.7 pounds per hour when operating at a process weight rate of 14.0 tons per hour.~~

- ~~(b) This limit is based upon the following:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$\text{E} = 4.10 \text{ P}^{0.67} \text{ where E = rate of emission in pounds per hour and } \text{P} = \text{process weight rate in tons per hour}$$

##### ~~D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

### **Compliance Determination Requirements**

#### **~~D.3.5 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]~~**

- ~~(a) In order to comply with Conditions D.3.1, D.3.2 and D.3.3, the baghouse, identified as MB2, for PM control shall be in operation at all times when the sizing line is in operation.~~
- ~~(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

### **Compliance Monitoring Requirements ~~[326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]~~**

#### **~~D.3.6 Baghouse Parametric Monitoring [326 IAC 2-8-5]~~**

- ~~(a) The Permittee shall record the pressure drop across the baghouse, identified as MB2, used in conjunction with the sizing line, at least once per day when the sizing line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps, shall be considered a deviation from this permit.~~
- ~~(b) The instruments used for determining the pressure and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.~~

#### **~~D.3.7 Broken or Failed Bag Detection~~**

- ~~(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.~~
- ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- ~~(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.~~
- ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.~~

~~D.3.8 Visible Emissions Notations~~

- ~~(a) Visible emission notations of the sizing line stack exhaust, S-MB2, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

**Record Keeping and Reporting Requirements ~~[326 IAC 2-8-4(3)] [326 IAC 2-8-16]~~**

~~D.3.9 Record Keeping Requirements~~

- ~~(a) To document the compliance status with Condition D.3.6, the Permittee shall maintain daily records of the pressure drop of baghouse MB2 during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the sizing line did not operate that day).~~
- ~~(b) To document the compliance status with Condition D.3.8, the Permittee shall maintain records of visible emission notations of the sizing line stack exhaust S-MB2 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).~~
- ~~(c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.~~

**SECTION D.1**

**EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) raw material unloading area, consisting of ten (10) bays, identified as RMUA, approved for modification in 2011, using baghouse MB4 for particulate control, and exhausting through stack S-MB4;**

**(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)**

## **Emission Limitations and Standards [326 IAC 2-8-4]**

### **D.1.1 $PM_{10}$ and $PM_{2.5}$ Limitations [326 IAC 2-8-4] [326 IAC 2-2]**

- (a) Pursuant to 326 IAC 2-8-4, the  $PM_{10}$  emissions from the Raw Material Unloading Area (RMUA), shall not exceed 3.34 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the  $PM_{2.5}$  emissions from the Raw Material Unloading Area (RMUA), shall not exceed 3.34 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit  $PM_{10}$  and  $PM_{2.5}$  from other emission units at the source, shall limit the  $PM_{10}$  and  $PM_{2.5}$  from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

### **D.1.2 PM Limitations [326 IAC 2-2]**

Pursuant to 326 IAC 2-8-4, the PM emissions from the Raw Material Unloading Area (RMUA), shall not exceed 3.34 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

### **D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the particulate from the Raw Material Unloading Area (RMUA) shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### **D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

## **Compliance Determination Requirements**

### **D.1.5 Testing Requirements [326 IAC 2-1.1-11]**

- (a) In order to demonstrate compliance with Conditions D.1.2 and D.1.3, the Permittee shall perform PM testing of the Raw Material Unloading Area (RMUA), within 180 days of startup, utilizing methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform  $PM_{10}$  testing of the Raw Material Unloading Area (RMUA), within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform  $PM_{2.5}$  testing of the Raw Material Unloading Area (RMUA), within 180 days of startup, utilizing methods as approved by the Commissioner.

**These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.**

**Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

**D.1.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]**

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- (a) In order to comply with Conditions D.1.1 and D.1.2, the cyclone and baghouse for PM control shall be in operation at all times when the Raw Material Unloading Area (RMUA) is in operation.**
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]**

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- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB4, used in conjunction with the Raw Material Unloading Area (RMUA), at least once per day when the Raw Material Unloading Area (RMUA) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.**
- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.**

**D.1.8 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.**

**Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.**

**Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.**

#### **D.1.9 Visible Emissions Notations**

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- (a) **Visible emission notations of the Raw Material Unloading Area (RMUA) stack exhaust, S-MB4, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.1.10 Record Keeping Requirements**

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- (a) **To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).**
- (b) **To document the compliance status with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the Raw Material Unloading Area (RMUA) stack exhaust S-MB4 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).**
- (c) **Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.**

#### **SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

##### **Emissions Unit Description:**

- (b) **One (1) Milling Operation Stage #1, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB1 for particulate control, exhausting through stack S-MB1, and consisting of the following:**

- (1) Two (2) Grizzly Feeders, identified as GF1 and GF2, installed in 1998;
- (2) One (1) tumbler, identified as T, installed in 1996;
- (3) One (1) shaker table infeed conveyor, identified as ST1;
- (4) Six (6) screw conveyors, identified as SC1 through SC6; and
- (5) One (1) belt conveyor, identified as BC2.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4]

##### D.2.1 PM<sub>10</sub> and PM<sub>2.5</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the milling operation Stage #1 shall not exceed 4.75 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the PM<sub>2.5</sub> emissions from the milling operation Stage #1 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from other emission units at the source, shall limit the PM<sub>10</sub> and PM<sub>2.5</sub> from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

##### D.2.2 PM Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the milling operation Stage #1 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

##### D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the milling operation Stage #1 shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

##### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

#### Compliance Determination Requirements

**D.2.5 Testing Requirements [326 IAC 2-1.1-11]**

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- (a) In order to demonstrate compliance with Conditions D.2.2 and D.2.3, the Permittee shall perform PM testing of the milling operation Stage #1, consisting of two (2) Grizzly Feeders, one (1) tumbler, one (1) shaker table infeed conveyor, six (6) screw conveyors, and one (1) belt conveyor, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM10 testing of the milling operation Stage #1, consisting of two (2) Grizzly Feeders, one (1) tumbler, one (1) shaker table infeed conveyor, six (6) screw conveyors, and one (1) belt conveyor, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM2.5 testing of the milling operation Stage #1, consisting of two (2) Grizzly Feeders, one (1) tumbler, one (1) shaker table infeed conveyor, six (6) screw conveyors, and one (1) belt conveyor, within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

**D.2.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]**

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- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation at all times when the milling operation Stage #1 is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]**

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- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB1, used in conjunction with the milling operation Stage #1, at least once per day when the milling operation Stage #1 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instruments used for determining the pressure shall comply with Section C -

**Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.**

#### **D.2.8 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### **D.2.9 Visible Emissions Notations**

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- (a) Visible emission notations of the milling operation Stage #1 stack exhaust, S-MB1, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.2.10 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).

- (b) To document the compliance status with Condition D.2.9, the Permittee shall maintain records of visible emission notations of the milling operation Stage #1 stack exhaust S-MB1 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

**SECTION D.3. EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (c) One (1) Milling Operation Stage #2, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB2 for particulate control, exhausting through stack S-MB2, and consisting of the following:
  - (1) One (1) Mega Slam primary crusher, identified as MS, installed in 1998;
  - (2) One (1) Mega Slam shaker table/grizzly, identified as ST2;
  - (3) One (1) Midwest screen, identified as SS1;
  - (4) Six (6) screw conveyors, identified as SC7 through SC12;
  - (5) Four (4) belt conveyors, identified as BC1, BC3, BC4, and BC5; and
  - (6) Three (3) raw material unloading bays.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-8-4]**

**D.3.1 PM<sub>10</sub> and PM<sub>2.5</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]**

- (a) Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the milling operation Stage #2 shall not exceed 4.75 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the PM<sub>2.5</sub> emissions from the milling operation Stage #2 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from other emission units at the source, shall limit the PM<sub>10</sub> and PM<sub>2.5</sub> from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

**D.3.2 PM Limitations [326 IAC 2-2]**

Pursuant to 326 IAC 2-8-4, the PM emissions from the milling operation Stage #2 shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other

emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

**D.3.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2, the particulate from the milling operation Stage #2 shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.

This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

**D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

---

A Preventative Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.3.5 Testing Requirements [326 IAC 2-1.1-11]**

---

- (a) In order to demonstrate compliance with Conditions D.3.2 and D.3.3, the Permittee shall perform PM testing of the milling operation Stage #2, consisting of one (1) Mega Slam crusher, one (1) Mega Slam shaker table/grizzly, one (1) Midwest screen, six (6) screw conveyors, four (4) belt conveyors, and three (3) raw material unloading bays, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (b) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM10 testing of the milling operation Stage #2, consisting of one (1) Mega Slam crusher, one (1) Mega Slam shaker table/grizzly, one (1) Midwest screen, six (6) screw conveyors, four (4) belt conveyors, and three (3) raw material unloading bays, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM2.5 testing of the milling operation Stage #2, consisting of one (1) Mega Slam crusher, one (1) Mega Slam shaker table/grizzly, one (1) Midwest screen, six (6) screw conveyors, four (4) belt conveyors, and three (3) raw material unloading bays, within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### **D.3.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]**

---

- (a) In order to comply with Conditions D.3.1 and D.3.2, the baghouse for PM control shall be in operation at all times when the milling operation Stage #2 is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.3.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]**

---

- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB2, used in conjunction with the milling operation Stage #2, at least once per day when the milling operation Stage #2 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### **D.3.8 Broken or Failed Bag Detection**

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### **D.3.9 Visible Emissions Notations**

---

- (a) Visible emission notations of the milling operation Stage #2 stack exhaust, S-MB2,

shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.3.10 Record Keeping Requirements**

- (a) To document the compliance status with Condition D.3.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.3.9, the Permittee shall maintain records of visible emission notations of the milling operation Stage #2 stack exhaust S-MB2 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

**SECTION D.4. EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (d) One (1) Milling Operation Stage #3, approved for modification in 2011, with a maximum throughput capacity of twenty (20) tons per hour of aluminum dross and/or salt cake, all using baghouse MB3 for particulate control, exhausting through stack S-MB3, and consisting of the following:
  - (1) One (1) Cage Mill secondary crusher, identified as CM, installed in 1998;
  - (2) One (1) Midwest screen, identified as SS2;
  - (3) Ten (10) screen conveyors, identified as SC13 through SC22;

- (4) Four (4) belt conveyors, identified as BC6 through BC9; and
- (5) Three (3) tank discharge vibratory feeders, identified as PF1, PF2, and PF3.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4]

##### D.4.1 PM<sub>10</sub> and PM<sub>2.5</sub> Limitations [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the milling operation Stage #3, shall not exceed 4.75 pounds per hour.
- (b) Pursuant to 326 IAC 2-8-4, the PM<sub>2.5</sub> emissions from the milling operation Stage #3, shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from other emission units at the source, shall limit the PM<sub>10</sub> and PM<sub>2.5</sub> from the entire source to less than 100 tons per twelve (12) consecutive month period, each, and render 327 IAC 2-2 and 326 IAC 2-7 not applicable.

##### D.4.2 PM Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the milling operation Stage #3, shall not exceed 4.75 pounds per hour.

Compliance with the above limit, combined with the limited potential to emit PM from other emission units at the source, shall limit the PM from the entire source to less than 100 tons per twelve (12) consecutive month period and render 327 IAC 2-2 not applicable.

##### D.4.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate from the milling operation Stage #3 shall not exceed 30.51 pounds per hour when operating at a process weight rate of 20.0 tons per hour.
- (b) This limit is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

##### D.4.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

#### Compliance Determination Requirements

##### D.4.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.4.2 and D.4.3, the Permittee shall perform PM testing of the milling operation Stage #3, consisting of one (1) Cage Mill secondary crusher, one (1) Midwest screen, ten (10) screen conveyors, and four (4) belt conveyors, and three (3) tank discharge vibratory

feeders, within 180 days of startup, utilizing methods as approved by the Commissioner.

- (b) In order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM10 testing of the milling operation Stage #3, consisting of one (1) Cage Mill secondary crusher, one (1) Midwest screen, ten (10) screen conveyors, and four (4) belt conveyors, and three (3) tank discharge vibratory feeders, within 180 days of startup, utilizing methods as approved by the Commissioner.
- (c) In order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM2.5 testing of the milling operation Stage #3, consisting of one (1) Cage Mill secondary crusher, one (1) Midwest screen, ten (10) screen conveyors, and four (4) belt conveyors, and three (3) tank discharge vibratory feeders, within 180 days of startup, utilizing methods as approved by the Commissioner.

These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### **D.4.6 Particulate Matter (PM) [326 IAC 2-8-4(1)(D)]**

---

- (a) In order to comply with Conditions D.4.1 and D.4.2, the baghouse for PM control shall be in operation at all times when the milling operation Stage #3 is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.4.7 Baghouse Parametric Monitoring [326 IAC 2-8-5]**

---

- (a) The Permittee shall record the pressure drop across the baghouse, identified as MB3, used in conjunction with the milling operation Stage #3, at least once per day when the milling operation Stage #3 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instruments used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

#### **D.4.8 Broken or Failed Bag Detection**

---

- (a) For a single compartment baghouse controlling emissions from a process

operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

#### D.4.9 Visible Emissions Notations

---

- (a) Visible emission notations of the milling operation Stage #3 stack exhaust, S-MB3, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

##### D.4.10 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.4.7, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason of the lack of a pressure drop reading (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.4.9, the Permittee shall maintain records of visible emission notations of the milling operation Stage #3 stack exhaust S-MB3 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible

emission notation (e.g., the plant did not operate that day).

- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

~~SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS~~

~~Emissions Unit Description:~~

- ~~(a) Two (2) natural gas fired oxygen rotary furnaces, identified as F1 and F2, rated at 7.0 million British thermal units per hour each, both controlled by a baghouse with lime injection, identified as FB1, exhausting through Stack S-FB1, installed in 1998 and 2000, respectively, capacity: 3.5 tons per hour of aluminum dross or aluminum scrap each.~~

~~Under NESHAP 40 CFR 63, Subpart RRR, this source is considered an effected facility.~~

- ~~(b) One (1) enclosed salt cake cooling rack with hood, installed in 2000, controlled by a baghouse, identified as FB1, exhausting through Stack S-FB1, capacity: 5.5 tons of salt cake per hour.~~

~~Under NESHAP 40 CFR 63, Subpart RRR, this source is considered an effected facility.~~

~~(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)~~

~~Emission Limitations and Standards [326 IAC 2-8-4(1)]~~

~~E.1.1 General Provisions Relating to NESHAP Subpart RRR (National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production) [326 IAC 20-1-1][40 CFR Part 63, Subpart A]~~

~~Pursuant to 40 CFR 63.1518, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A-General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart RRR.~~

~~E.1.2 NESHAP Subpart RRR Requirements [40 CFR 63, Subpart RRR]~~

~~Pursuant to 40 CFR, Subpart RRR, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart RRR, beginning upon issuance of this FESOP Renewal.~~

<del>(1) 40 CFR 63.1500</del>	<del>(9) 40 CFR 63.1512</del>
<del>(2) 40 CFR 63.1501</del>	<del>(10) 40 CFR 63.1513</del>
<del>(3) 40 CFR 63.1502</del>	<del>(11) 40 CFR 63.1515</del>
<del>(4) 40 CFR 63.1503</del>	<del>(12) 40 CFR 63.1516</del>
<del>(5) 40 CFR 63.1505</del>	<del>(13) 40 CFR 63.1517</del>
<del>(6) 40 CFR 63.1506</del>	<del>(14) 40 CFR 63.1518</del>
<del>(7) 40 CFR 63.1510</del>	<del>(15) 40 CFR 63.1519</del>
<del>(8) 40 CFR 63.1511</del>	

**OFFICE OF AIR QUALITY  
 Compliance and Enforcement Branch**

**FESOP Quarterly Report**

Source Name: \_\_\_\_\_ Aleris Recycling, Inc. \_\_\_\_\_  
 Source Address: \_\_\_\_\_ 305 Dimension Avenue, Wabash, Indiana 46992 \_\_\_\_\_  
 FESOP Permit No.: \_\_\_\_\_ F169-26165-00035 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Natural Gas-Fired Rotary Furnaces \_\_\_\_\_  
 Parameter: \_\_\_\_\_ HCL \_\_\_\_\_  
 Limit: \_\_\_\_\_ 49,500 tons per year at 0.4 pounds per ton \_\_\_\_\_

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- \_\_\_\_\_  No deviation occurred in this quarter.  
 \_\_\_\_\_  Deviation/s occurred in this quarter.  
 \_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 10, 2011.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 169-30783-00035. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Jack Harmon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

Appendix A : Emission Calculations - Entire Source

Company Name: Aleris Recycling, Inc.  
 Address City IN Zip: 305 Dimension Avenue, Wabash, Indiana 46992  
 Permit Number: 169-30783-00035  
 Pit ID: 169-00035  
 Reviewer: Jack Harmon  
 Date: 2011

SUMMARY of Entire Source  
 Uncontrolled Potential Emissions (Before Controls) (TPY)

Emission Units / Control Device	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Total HAPs	Worst HAP	HAP
Raw Material Unloading Area (RMUA) / MB4	142.66	142.66	142.66	0.00	0.00	0.00	0.00	3.12E-02	1.51E-02	Manganese
Milling Operations Stage #1 / MB1	7508.57	7508.57	7508.57	0.00	0.00	0.00	0.00	1.64E+00	7.96E-01	Manganese
Milling Operations Stage #2 / MB2	7508.57	7508.57	7508.57	0.00	0.00	0.00	0.00	1.64E+00	7.96E-01	Manganese
Milling Operations Stage #3 / MB3	7508.57	7508.57	7508.57	0.00	0.00	0.00	0.00	1.64E+00	7.96E-01	Manganese
Insignificant Activities <sup>8)</sup>	4.99	1.48	1.48	0.00	0.00	0.00	0.00	0.00E+00	0	
Fugitive Emissions	4.44	0.89	0.22	0.00	0.00	0.00	0.00	0.00E+00	0	
Total	22,677.80	22,670.74	22,670.07	0.00	0.00	0.00	0.00	4.96E+00	2.40E+00	Manganese

SUMMARY of Entire Source  
 Controlled Potential Emissions (After Controls) (TPY)

Emission Units / Control Device	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Total HAPs
Raw Material Unloading Area (RMUA) / MB4	0.36	0.36	0.36	0.00	0.00	0.00	0.00	3.70E-05
Milling Operations Stage #1 / MB1	18.77	18.77	18.77	0.00	0.00	0.00	0.00	4.10E-03
Milling Operations Stage #2 / MB2	18.77	18.77	18.77	0.00	0.00	0.00	0.00	4.10E-03
Milling Operations Stage #3 / MB3	18.77	18.77	18.77	0.00	0.00	0.00	0.00	4.10E-03
Insignificant Activities	4.99	1.48	1.48	0.00	0.00	0.00	0.00	0.00E+00
Fugitive Emissions	2.03	0.41	0.10	0.00	0.00	0.00	0.00	0.00E+00
Total	63.68	58.55	58.25	0.00	0.00	0.00	0.00	1.23E-02

SUMMARY of Entire Source  
 Limited Emissions (TPY)

Emission Units / Control Device	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Total HAPs
Raw Material Unloading Area (RMUA) / MB4	14.64	14.64	14.64	0.00	0.00	0.00	0.00	1.48E-02
Milling Operations Stage #1 / MB1	18.79	20.79	20.79	0.00	0.00	0.00	0.00	1.64E+00
Milling Operations Stage #2 / MB2	18.79	20.79	20.79	0.00	0.00	0.00	0.00	1.64E+00
Milling Operations Stage #3 / MB3	18.79	20.79	20.79	0.00	0.00	0.00	0.00	1.64E+00
Insignificant Activities	4.99	1.48	1.48	0.00	0.00	0.00	0.00	0.00E+00
Fugitive Emissions	3.00	1.00	0.50	0.00	0.00	0.00	0.00	0.00E+00
Total	79.00	79.49	78.99	0.00	0.00	0.00	0.00	4.94E+00

**Appendix A : Emission Calculations - of the Significant Permit Revision**

**Company Name:** Aleris Recycling, Inc.  
**Address City IN Zip:** 305 Dimension Avenue, Wabash, Indiana 46992  
**Permit Number:** 169-30783-00035  
**Pit ID:** 169-00035  
**Reviewer:** Jack Harmon  
**Date:** 2011

Emission Units / Control Device	Uncontrolled Potential to Emit							
	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	HAPs
Raw Material Unloading Area (RMUA) / MB4	142.66	142.66	142.66	0.00	0.00	0.00	0.00	1.48E-02
Milling Operations Stage #1 / MB1	7508.57	7508.57	7508.57	0.00	0.00	0.00	0.00	1.64E+00
Milling Operations Stage #2 / MB2	7508.57	7508.57	7508.57	0.00	0.00	0.00	0.00	1.64E+00
Milling Operations Stage #3 / MB3	7508.57	7508.57	7508.57	0.00	0.00	0.00	0.00	1.64E+00
Total This Revision	22,668.38	22,668.38	22,668.38	0.00	0.00	0.00	0.00	4.93E+00

**Notes:**

- The two (2) Rotary Oxygen furnaces are also being removed from the source; and baghouse MB2 is being replaced; however, permit level determination is based on the uncontrolled potential to emit of the new equipment, and does not consider emission units that have been removed.
- MB1 (previous MB2) is reconfigured, and MB2, MB3, and MB4 are new

Appendix A : Emission Calculations - Summary Before Revision

Company Name: Aleris Recycling, Inc.  
 Address City IN Zip: 305 Dimension Avenue, Wabash, Indiana 46992  
 Permit Number: 169-30783-00035  
 Plt ID: 169-00035  
 Reviewer: Jack Harmon  
 Date: 2011

**SUMMARY**  
 Potential Emissions Before Controls (TPY)

Process	PM	PM-10	SO2	NOx	VOC	CO	HAPs (D/F) & HCL
Two (2) Oxy Furnaces	512	512	0.000	0.000	0.000	0.000	67.400
Combustion - Two (2) Oxy Furnaces	0.100	0.399	0.032	0.023	0.289	4.42	0.000
Tumbler	65174	1787	0.000	0.000	0.000	0.000	0.000
Sizing Line	4.99	1.48	0.000	0.000	0.000	0.000	0.000
Estimated Insignificant Activities	1	1	0.5	0.5	2	0.5	0.5
<b>Total</b>	<b>65692</b>	<b>2302</b>	<b>0.532</b>	<b>0.523</b>	<b>2.289</b>	<b>4.92</b>	<b>67.9</b>

See below for Metals & Combustion HAPs  
 (ALL INSIG HAPs)

**SUMMARY**  
 Potential Emissions After Controls (TPY)

Process	PM	PM-10	SO2	NOx	VOC	CO	HAPs (D/F) & HCL
Two (2) Oxy Furnaces	0.512	0.512	0.000	0.000	0.000	0.000	6.140
Combustion - Two (2) Oxy Furnaces	0.1000	0.3990	0.032	0.023	0.289	4.42	0.000
Tumbler	65.174	1.787	0.000	0.000	0.000	0.000	0.000
Sizing Line	1.37	0.336	0.000	0.000	0.000	0.000	0.000
Estimated Insignificant Activities	1	1	0.5	0.5	2	0.5	0.5
<b>Total</b>	<b>68.2</b>	<b>4.03</b>	<b>0.532</b>	<b>0.523</b>	<b>2.289</b>	<b>4.92</b>	<b>6.64</b>

See below for Metals & Combustion HAPs  
 (ALL INSIG HAPs)

**SUMMARY**  
 Potential HAPs Emissions (TPY)

HAP	Before Controls				Total Process & Combustion Before Controls	After Controls				Total Process & Combustion After Controls
	Two (2) Oxy Furnaces Process Only	Before Controls Tumbler	Before Controls Sizing Line	Before Controls Oxy Furnaces Combustion		Two (2) Oxy Furnaces	After Controls Tumbler	After Controls Sizing Line	After Controls Combustion Oxy Furnaces	
Lead	1.403	0.9776	0.000074899	0.0000	2.38070	0.0014000	0.000978	0.000000075	0.0000	0.0024080750
Antimony	0.237	0.1648	0.000012629	0.0000	0.40181	0.0002400	0.000165	0.000000013	0.0000	0.0004050130
Arsenic	0.007	0.0049	0.000000374	0.0000	0.01190	0.0000100	0.000005	0.000000000	0.0000	0.0000150000
Beryllium	0.001	0.0007	0.000000055	0.0000	0.00170	0.0000000	0.000001	0.000000000	0.0000	0.0000010000
Cadmium	0.073	0.051	0.000003909	0.0001	0.12406	0.0000700	0.000051	0.000000004	0.0001	0.0001810040
Chromium	0.089	0.0621	0.000004756	0.0001	0.15117	0.0000900	0.000062	0.000000005	0.0001	0.0002220050
Colbalt	0.002	0.0012	0.000000096	0.0000	0.00320	0.0000000	0.000001	0.000000000	0.0000	0.0000010000
Manganese	0.354	0.2469	0.000018916	0.0000	0.60094	0.0003500	0.000247	0.000000019	0.0000	0.0006170190
Mercury	0.002	0.0012	0.000000090	0.0000	0.00320	0.0000000	0.000001	0.000000000	0.0000	0.0000010000
Nickel	0.042	0.0296	0.000002266	0.0001	0.07171	0.0000400	0.000030	0.000000002	0.0001	0.0001800020
Selenium	0.006	0.0041	0.000000314	0.0000	0.01010	0.0000100	0.000004	0.000000000	0.0000	0.0000140000
Benzene	0.000	0.0000	0.000000000	0.0001	0.00010	0.0000000	0.000000	0.000000000	0.0001	0.0001000000
Dichlorobezene	0.000	0.0000	0.000000000	0.0010	0.00100	0.0000000	0.000000	0.000000000	0.0010	0.0010000000
Formaldehyde	0.000	0.0000	0.000000000	0.0039	0.00390	0.0000000	0.000000	0.000000000	0.0039	0.0039000000
Hexane	0.000	0.0000	0.000000000	0.0946	0.09460	0.0000000	0.000000	0.000000000	0.0946	0.0946000000
Toluene	0.000	0.0000	0.000000000	0.0002	0.00020	0.0000000	0.000000	0.000000000	0.0002	0.0002000000
<b>Total</b>	<b>2.22</b>	<b>1.5442</b>	<b>0.000118304</b>	<b>0.0990</b>	<b>3.86332</b>	<b>0.0020000</b>	<b>0.001544</b>	<b>0.000000118</b>	<b>0.0990</b>	<b>0.1025441180</b>

**Appendix A: Emissions Calculations  
Secondary Aluminum Operations**

**Company Name:** Aleris Recycling, Inc.  
**Address City IN Zip:** 305 Dimension Avenue, Wabash, Indiana 46992  
**Permit Number:** 169-30783-00035  
**Plt ID:** 169-00035  
**Reviewer:** Jack Harmon  
**Date:** 2011

**Baghouse MB4, serving the Raw Material Unloading Area (RMUA)**

Control Device	Vent ID	Outlet Grain Loading	Flow Rate	Control Efficiency	Number of Units	Uncontrolled PM/PM10/PM2.5 PTE		Controlled PM/PM10/PM2.5 PTE	
		(gr/acfm)	(cfm)	(%)		(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Baghouse MB4	S-MB4	0.00025	38000	99.75%	1	32.57	142.66	0.081	0.36
<b>Total PTE:</b>							<b>142.66</b>		<b>0.36</b>

Limited PM10/PM2.5 PTE	
(lb/hr)	(ton/yr)
3.34	14.64

**Notes:**

Flow rate of 38000 cfm and control efficiency of 99.75% were provided by source.

Grain loading emission rate provided by source and based on information provided by baghouse manufacturer and process knowledge.

Although there are several emission points in the RMUA (i.e., 10 unloading bays), they are controlled by one baghouse. Calculations are based on grain loading from the baghouse; therefore, the number of units is one (1).

Metal HAPs from this baghouse are shown in a separate worksheet.

**Methodology:**

Potential Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1-Control Efficiency)

Potential Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1- Control Efficiency)

Controlled Emissions (lbs/hr) = Grain Outlet Loading (gr/acfm) \* Flow Rate (cfm) \* 60 minutes / 1 hr \* 1lb / 7000 gr \* Number of Units

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr) \* 8760 hrs / 2000 lbs

**Appendix A: Emissions Calculations  
Secondary Aluminum Operations**

**Company Name:** Aleris Recycling, Inc.  
**Address City IN Zip:** 305 Dimension Avenue, Wabash, Indiana 46992  
**Permit Number:** 169-30783-00035  
**Pit ID:** 169-00035  
**Reviewer:** Jack Harmon  
**Date:** 2011

**Baghouse MB1, serving the Milling Operation Stage #1 Processing Area**

Control Device	Vent ID	Outlet Grain Loading	Flow Rate	Control Efficiency	Number of Units	Uncontrolled PM/PM10/PM2.5 PTE		Controlled PM/PM10/PM2.5 PTE	
		(gr/acfm)	(cfm)	(%)		(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Baghouse MB1	S-MB1	0.0125	40000	99.75%	1	1714.29	7508.57	4.286	18.77
<b>Total PTE:</b>						<b>7508.57</b>		<b>18.77</b>	

Limited PM10/PM2.5 PTE	
(lb/hr)	(ton/yr)
4.75	20.79

**Notes:**

Flow rate of 40000 cfm and control efficiency of 99.75% were provided by source.

Grain loading emission rate provided by source and based on information provided by baghouse manufacturer and process knowledge.

Although there are several emission points in Milling Operation Stage #1 (described below), they are controlled by one baghouse. Calculations are based on grain loading from the baghouse; therefore, the number of units is one (1).

Metal HAPs from this baghouse are shown in a separate worksheet.

**Methodology:**

Potential Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1-Control Efficiency)

Potential Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1- Control Efficiency)

Controlled Emissions (lbs/hr) = Grain Outlet Loading (gr/acfm) \* Flow Rate (cfm) \* 60 minutes / 1 hr \* 1lb / 7000 gr \* Number of Units

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr) \* 8760 hrs / 2000 lbs

**Milling Operation Stage #1 Processing Area includes:**

- Grizzly Feeders, GF1 and GF2
- Tumbler, T
- Shaker Table Infeed Conveyor, ST1
- Screw Conveyors, SC1 through SC6
- Belt Conveyor, BC2

**Methodology**

Concentration of HAPs in Baghouse Dust Measured at Alumitech of Wabash, Inc., and was incorporated into FESOP 169-26165-00035, issued January 15, 2009.

Relative Concentration in percent in the percent of total HAPs

The Indexed to Tumbler Dust Most Recent Tumbler RCRA Waste Determination Analysis (TCLP) of Lead x 20 (measured leachable and back calculated solids for lead)

For the other HAPs it is the Lead Value (10) Times the Ratio of the Concentration of the HAP to the Concentration of Lead

Conversion of TPY to kg/yr, multiply by 907.1847

Potential HAPs Before Controls (mg/yr) = HAP Indexed to Tumbler Dust (mg/kg) times PM PTE (kg/yr)

Potential HAPs Before Controls (TPY) with 150% Safety Factor = 1.5 times Potential HAPs Before Controls (mg/yr) times 907184700 mg/ton

**Appendix A: Emissions Calculations  
Secondary Aluminum Operations**

**Company Name:** Aleris Recycling, Inc.  
**Address City IN Zip:** 305 Dimension Avenue, Wabash, Indiana 46992  
**Permit Number:** 169-30783-00035  
**Pit ID:** 169-00035  
**Reviewer:** Jack Harmon  
**Date:** 2011

**Baghouse MB2, serving the Milling Operation Stage #2 Processing Area**

Control Device	Vent ID	Outlet Grain Loading	Flow Rate	Control Efficiency	Number of Units	Uncontrolled PM/PM10/PM2.5 PTE		Controlled PM/PM10/PM2.5 PTE	
		(gr/acfm)	(cfm)	(%)		(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Baghouse MB2	S-MB2	0.0125	40000	99.75%	1	1714.29	7508.57	4.286	18.77
<b>Total PTE:</b>						<b>7508.57</b>		<b>18.77</b>	

Limited PM10/PM2.5 PTE	
(lb/hr)	(ton/yr)
4.75	20.79

**Notes:**

Flow rate of 40000 cfm and control efficiency of 99.75% were provided by source.

Grain loading emission rate provided by source and based on information provided by baghouse manufacturer and process knowledge.

Although there are several emission points in Milling Operation Stage #2 (described below), they are controlled by one baghouse. Calculations are based on grain loading from the baghouse; therefore, the number of units is one (1).

Metal HAPs from this baghouse are shown in a separate worksheet.

**Methodology:**

Potential Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1-Control Efficiency)

Potential Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1- Control Efficiency)

Controlled Emissions (lbs/hr) = Grain Outlet Loading (gr/acfm) \* Flow Rate (cfm) \* 60 minutes / 1 hr \* 1lb / 7000 gr \* Number of Units

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr) \* 8760 hrs / 2000 lbs

**Milling Operation Stage #2 Processing Area includes:**

- Mega Slam, MS
- Mega Slam Shaker Table/Grizzly, ST2
- Midwest Screen, SS1
- Screw Conveyors, SC7 through SC12
- Belt Conveyors, BC1, BC3, BC4, and BC5
- Raw Material Unloading Bays (11, 12, and 13)

**Appendix A: Emissions Calculations  
Secondary Aluminum Operations**

**Company Name:** Aleris Recycling, Inc.  
**Address City IN Zip:** 305 Dimension Avenue, Wabash, Indiana 46992  
**Permit Number:** 169-30783-00035  
**Pit ID:** 169-00035  
**Reviewer:** Jack Harmon  
**Date:** 2011

**Baghouse MB3, serving the Milling Operation Stage #3 Processing Area**

Control Device	Vent ID	Outlet Grain Loading	Flow Rate	Control Efficiency	Number of Units	Uncontrolled PM/PM10/PM2.5 PTE		Controlled PM/PM10/PM2.5 PTE	
		(gr/acfm)	(cfm)	(%)		(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Baghouse MB3	S-MB3	0.0125	40000	99.75%	1	1714.29	7508.57	4.286	18.77
<b>Total PTE:</b>						<b>7508.57</b>		<b>18.77</b>	

Limited PM10/PM2.5 PTE	
(lb/hr)	(ton/yr)
4.75	20.79

**Notes:**

Flow rate of 40000 cfm and control efficiency of 99.75% were provided by source.

Grain loading emission rate provided by source and based on information provided by baghouse manufacturer and process knowledge.

Although there are several emission points in Milling Operation Stage #3 (described below), they are controlled by one baghouse. Calculations are based on grain loading from the baghouse; therefore, the number of units is one (1).

Metal HAPs from this baghouse are shown in a separate worksheet.

**Methodology:**

Potential Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1-Control Efficiency)

Potential Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1- Control Efficiency)

Controlled Emissions (lbs/hr) = Grain Outlet Loading (gr/acfm) \* Flow Rate (cfm) \* 60 minutes / 1 hr \* 1lb / 7000 gr \* Number of Units

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr) \* 8760 hrs / 2000 lbs

**Milling Operation Stage #3 Processing Area includes:**

- Cage Mill, CM
- Midwest Screen, SS2
- Screw Conveyors, SC13 through SC22
- Belt Conveyors, BC6 through BC9
- Tank Discharge Vibratory Feeders, PF1, PF2, and PF3

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** Aleris Recycling, Inc.  
**Source Address:** 305 Dimension Avenue, Wabash, Indiana 46992  
**Permit Number:** 169-30783-00035  
**Reviewer:** 169-00035  
**Date:** Jack Harmon  
2011

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	32.0	1.0	32.0	38.5	1232.0	792	0.150	4.8	1752.0
Vehicle (leaving plant) (one-way trip)	32.0	1.0	32.0	5.0	160.0	792	0.150	4.8	1752.0
<b>Totals</b>			<b>64.0</b>		<b>1392.0</b>			<b>9.6</b>	<b>3504.0</b>

Average Vehicle Weight Per Trip = 27.25 tons/trip  
Average Miles Per Trip = 0.30 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.3	27.3	27.3	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>3</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	2.532	0.506	0.1243	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	2.315	0.463	0.1136	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	2.22	0.44	0.11	2.03	0.41	0.10	1.01	0.20	0.05
Vehicle (leaving plant) (one-way trip)	2.22	0.44	0.11	2.03	0.41	0.10	1.01	0.20	0.05
<b>Totals</b>	<b>4.44</b>	<b>0.89</b>	<b>0.22</b>	<b>4.06</b>	<b>0.81</b>	<b>0.20</b>	<b>2.03</b>	<b>0.41</b>	<b>0.10</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
PTE = Potential to Emit

**Appendix A: Emissions Calculations  
Secondary Aluminum Operations**

**Company Name: Aleris Recycling, Inc.  
Address City IN Zip: 305 Dimension Avenue, Wabash, Indiana 46992  
Permit Number: 169-30783-00035  
Pit ID: 169-00035  
Reviewer: Jack Harmon  
Date: 2011**

**HAPs Emissions from Milling Processes**

Emission Unit	Uncontrolled PM (tpy)	Alloy Concentration at 5% of PM (tpy)	Emissions (tpy)						Controlled Total HAPs (tpy)
			Cadmium	Chromium	Lead	Manganese	Nickel	Total HAPs (tpy)	
Baghouse MB1	142.66	7.13	7.13E-06	3.58E-03	5.21E-03	1.51E-02	7.28E-03	3.12E-02	3.70E-05
Baghouse MB2	7508.57	375.43	3.75E-04	1.88E-01	2.74E-01	7.96E-01	3.83E-01	1.64E+00	4.10E-03
Baghouse MB3	7508.57	375.43	3.75E-04	1.88E-01	2.74E-01	7.96E-01	3.83E-01	1.64E+00	4.10E-03
Baghouse MB4	7508.57	375.43	3.75E-04	1.88E-01	2.74E-01	7.96E-01	3.83E-01	1.64E+00	4.10E-03
TOTALS	22,668.38	1133.42	1.13E-03	5.69E-01	8.27E-01	<b>2.40E+00</b>	1.16E+00	<b>4.96E+00</b>	1.23E-02

**Methodology:**

- Uncontrolled particulate from grain loading (separate worksheet) for each baghouse.
- Alloy concentration obtained from source, based on data gathered at source of 2% to 5% range. Worst case of 5% was used.
- Factors for top five metal HAPs provided by source, and were average concentrations for each metal, and was obtained from SARA/TRI data for reporting year 2010.

Alloy concentration (tpy) = Uncontrolled PM (tpy) \* 5%

Cadmium emissions (tpy) = cadmium concentration \* total alloy concentration

Same calculation methodology for the metal HAPs of chromium, lead, manganese, and nickel.

Controlled HAPs based on Controlled PM from Baghouse worksheets. = Controlled PM \* Alloy concentration \* Total HAPs



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Archie Haney  
Aleris Recycling, Inc  
305 Dimension Ave  
Wabash, IN 46992

DATE: December 29, 2011

FROM: Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

SUBJECT: Final Decision  
Significant Permit Revision  
169-30783-00035

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Phillip Brown (Plant Manager)  
Matt Thomas (Conestoga – Rovers & Associates)  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

December 29, 2011

TO: Wabash Carnegie Public Library

From: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Aleris Recycling, Inc**  
**Permit Number: 169-30783-00035**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 12/29/2011 Aleris Recycling, Inc. 169-30783-00035 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Archie Haney Aleris Recycling, Inc. 305 Dimension Ave Wabash IN 46992 (Source CAATS) via confirm delivery										
2		Phillip Brown Plant Mgr Aleris Recycling, Inc. 305 Dimension Ave Wabash IN 46992 (RO CAATS)										
3		Ms. Lamonie Silvers 30056 South 100 West Wabash IN 46992 (Affected Party)										
4		Ms. Lynn A. Yohe 63 East Hill Street Wabash IN 46992 (Affected Party)										
5		Mr. Larry C. Thrush One North Wabash Wabash IN 46992 (Affected Party)										
6		Mr. Jerry M. Ault 3441 South 100 west Wabash IN 46992 (Affected Party)										
7		Mr. John Forrester 1400 S. Wabash St Wabash IN 46992 (Affected Party)										
8		Mr. William E. Hunter 55 West Market Wabash IN 46992 (Affected Party)										
9		Mr. Donald R. Mertz 99 West Canal Street Wabash IN 46992 (Affected Party)										
10		Mr. Michael W. Elward 1300 South Wabash Street Wabash IN 46992 (Affected Party)										
11		Wabash County Commissioners 1 West Hill Street Wabash IN 46992 (Local Official)										
12		Wabash City Council and Mayors Office 202 South Wabash Street Wabash IN 46992 (Local Official)										
13		Wabash County Health Department 89 W. Hill, Memorial Hall Wabash IN 46992-3184 (Health Department)										
14		Ted Little Wabash County Council 1076 West 900 North North Manchester IN 46962 (Affected Party)										
15		Wabash Carnegie Public Library 188 W Hill St Wabash IN 46992-3048 (Library)										

Total number of pieces Listed by Sender  <b>14</b>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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# Mail Code 61-53

IDEM Staff	MIDENNEY 12/29/2011 Aleris Recycling, Inc. 169-30783-00035 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
2		Matt Thomas Conestoga-Rovers & Associates 6520 Corporate Drive Indianapolis IN 46278 (Consultant)										
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5												
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14												
15												

Total number of pieces Listed by Sender  <b>2</b>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on insured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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